



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor
Toni Hardesty, Director

September 26, 2007

Certified Mail No. 7102 0243 6844 0000 0458

Rebecca Gordon, Secretary-Treasurer
Snake River Trailer Company
P. O. Box 879
Caldwell, ID 83606

RE: Facility ID No. 027-00097, Snake River Trailer Company, Caldwell
Final Permit Letter

Dear Ms. Gordon:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2007.0175 to Snake River Trailer Company at 315 Kit Avenue, Caldwell, in accordance with IDAPA 58.01.01.200 through 228 (Rules for the Control of Air Pollution in Idaho).

This permit is based on your permit application received on August 21, 2007. This permit is effective immediately and replaces PTC No. P-2007.0040, issued on July 19, 2007, the terms and conditions of which no longer apply. This permit does not release Snake River Trailer Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Thomas Krinke, Air Quality Science Officer, at (208) 373-0550 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Carole Zundel at (208) 373-0477 or carole.zundel@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in cursive script, appearing to read "Mike Simon".

Mike Simon
Stationary Source Program Manager
Air Quality Division

MSVCZ/hp

Project No. P-2007.0175

Enclosures

Snake River Trailer Company, Caldwell
September 26, 2007
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HARD COPY TO FACILITY

en: Tom Krinke, Boise Regional Office
Bill Rogers, Permit Coordinator
Carole Zundel, Permit Writer
Marilyn Seymore/ Pat Rayne, AQ Division
Stationary Source Administrative Assistant

en-web: Laurie Kral, U.S. EPA Region 10

ec: Rebecca Gordon, cbtrls@spro.net
Jason Fox, srtc@hughes.net
Sarah Stine, TORF Environmental Management, slstine@torf.us

c: Reading File (Ltr Only)
Source File
Permit Binder
Bill Rogers, Permit Coordinator (Ltr Only)
Phyllis Heitman, AQ Division (Ltr Only)



**Air Quality
PERMIT TO CONSTRUCT
State of Idaho
Department of Environmental Quality**

PERMIT No.: P-2007.0175
FACILITY ID No.: 027-00097
AQCR: 64 **CLASS:** SM80
SIC: 3715 **ZONE:** 11
UTM COORDINATE (km): 523.9, 4835.3

1. PERMITTEE

Snake River Trailer Company

2. PROJECT

Administrative amendment

3. MAILING ADDRESS

P.O. Box 879

CITY

Caldwell

STATE

ID

ZIP

83606

4. FACILITY CONTACT

Jason Fox

TITLE

Plant Manager

TELEPHONE

(208) 453-8474

5. RESPONSIBLE OFFICIAL

Rebecca Gordon

TITLE

Secretary-Treasurer

TELEPHONE

(208) 453-8474

6. EXACT PLANT LOCATION

315 Kit Avenue, Caldwell, Idaho 83605

COUNTY

Canyon

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS

Manufacture and painting of horse, utility, and cargo trailers

8. PERMIT AUTHORITY

This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.200 through 228, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be constructed or modified by this permit.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the Department of Environmental Quality (DEQ) or its officers, agents, or employees, assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment.

This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes in design, equipment or operations may be considered a modification. Modifications are subject to DEQ review in accordance with IDAPA 58.01.01.200 through 228 of the Rules for the Control of Air Pollution in Idaho.

Carole Zundel

CAROLE ZUNDEL, PERMIT WRITER
DEPARTMENT OF ENVIRONMENTAL QUALITY

Mike Simon

MIKE SIMON, STATIONARY SOURCE PROGRAM
MANAGER
DEPARTMENT OF ENVIRONMENTAL QUALITY

DATE MODIFIED/REVISED:

September 26, 2007

DATE ISSUED:

July 19, 2007

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Acronyms, Units, and Chemical Nomenclature

AQCR	Air Quality Control Region
DEQ	Department of Environmental Quality
HAP	hazardous air pollutant
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
km	kilometer
MSDS	Material Safety Data Sheet(s)
O&M	operations and maintenance
PTC	permit to construct
SIC	Standard Industrial Classification
T/yr	tons per any consecutive 12-month period
TAP	toxic air pollutant
UTM	Universal Transverse Mercator
VOC	volatile organic compound

AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-2007.0175

Permittee:	Snake River Trailer Company	Facility ID No. 027-00097
Location:	Caldwell, Idaho	

1. PERMIT TO CONSTRUCT SCOPE

Purpose

- 1.1 The purpose of this permit is to administratively amend permit conditions to track the material usage on a daily basis instead of requiring calculation of the TAP emissions each day.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by a date citation located directly under the permit condition and on the right hand margin.
- 1.3 This PTC replaces PTC No. P-2007.0040, issued on July 19, 2007, the terms and conditions of which shall no longer apply.

Regulated Sources

- 1.4 Table 1.1 lists all sources of regulated emissions in this PTC.

Table 1.1 SUMMARY OF REGULATED SOURCES

Permit Section	Source Description	Emissions Control(s)
2	Paint Booth 1 (PB-1)	30 Air Filters, Electrostatic Conventional air gun with a 50-65% transfer efficiency.
2	Paint Booth 2 (PB-2)	30 Air Filters, Electrostatic Conventional air gun with a 50-65% transfer efficiency.
3	Fuel Burning Equipment (PB-1 and PB-2 Air Heaters) (Curing Room (CR-1) Air Heater) (CR-1 Exhaust Equipment)	None

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2. PAINT BOOTHS: PB-1 AND PB-2

2.1 Process Description

The facility operates two “pull-through”¹ paint booths with their related equipment and one curing booth; for the priming and painting of horse, cargo, and utility trailers.

2.2 Emissions Control Description

Table 2.1 EMISSIONS CONTROL DESCRIPTION FROM PAINT BOOTHS 1 AND 2

Emissions Unit(s) / Process(es)	Emissions Control Device	Emissions Point
PB-1 and PB-2 (Identical process equipment, control devices, and emission points in each booth)	<p align="center"><u>Electrostatic HVLP Air Gun</u> Manufacturer: Sames or equivalent. Model No.: MIV6600 Capacity: 5.63 gals/hr. with 50-65% Transfer Efficiency</p> <p align="center"><u>Air Filters</u> Manufacturer: American Air Filters or equivalent Model: AG-28 Size/Efficiency: 30 (15 per stack) 20x25 inch filters, 2 inches thick; 98.13% efficiency.</p> <p align="center"><u>Exhaust Fan and Motor (two sets per booth):</u> Manufacturer: Spray Systems, Inc. or equivalent Model: Tubeaxial Exhaust Fans Rating: 12,000 CFM per fan.</p> <p align="center">Manufacturer: 3 hp TEFC Motors or equivalent Model: 230-460V-60hz-3pH Rating, Total CFM: 24,000 Average Velocity: 50 FPM or equivalent.</p>	PB-1: Exhaust Stacks 1 and 2 PB-2: Exhaust Stacks 1 and 2

Emissions Limits

2.3 HAP Emissions Limits

- HAP emissions from the facility shall be less than 10 tons per any consecutive 12-month period (T/yr) for any single HAP.

¹ Each paint booth is equipped with pull through or drive through size bi-fold doors at each end of the booth; attaching the booths, and then attaching the dry room to the second booth. Enter and Exit doors are also bi-fold drive through size door that provides net openings of 9.71 ft. high by 13.875 ft. wide.

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- HAP emissions from the facility shall be less than 25 tons per any consecutive 12-month period (T/yr) for any combination of HAPs.

2.4 VOC Emissions Limit

VOC emissions from the facility shall not exceed 71.5 tons per any consecutive 12-month period (T/yr).

2.5 TAP Emissions Limit

The permittee shall comply with IDAPA 58.01.01.210 for toxic air pollutants emitted from this facility.

Operating Requirements

2.6 Work Practices

The permittee shall keep all VOC product containers covered/closed when not in use.

2.7 Material Purchase Records

The permittee shall maintain the purchase records of all horse, cargo, and utility trailer manufacturing and painting, materials that contain HAPs, TAPs, and/or VOCs including but not limited to, adhesives, caulks, degreasers, solvents, primers, and paints. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

2.8 Material Safety Data Sheets

The permittee shall maintain the current MSDS' for the horse, cargo, and utility trailer manufacturing materials purchases and used at the facility. If the constituents of any product are changed, a record of the date of commencement of usage of the new product shall be kept as well as both the old and new MSDS'.

Monitoring and Recordkeeping Requirements

2.9 Material Usage Records

The permittee shall monitor and record daily, the usage of each horse, cargo, and utility trailer manufacturing and painting material that contains HAPs, TAPs, and/or VOCs. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

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2.10 HAP Recordkeeping Requirements

The permittee shall calculate the monthly and annual HAP emissions from the horse, cargo, and utility trailer manufacturing and painting material used, using the purchase records required by Permit Condition 2.7, the MSDS' required by Permit Condition 2.8, and the material usage records required by Permit Condition 2.9 to demonstrate compliance with Permit Condition 2.3. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

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2.11 VOC Recordkeeping Requirements

The permittee shall calculate the monthly and annual VOC emissions from the horse, cargo, and utility trailer manufacturing and painting material purchase records required by Permit Condition 2.7, the MSDS' required by Permit Condition 2.8 and the material usage records required by Permit Condition 2.9 to demonstrate compliance with Permit Condition 2.4. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

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2.12 TAP Recordkeeping Requirements

The permittee shall calculate the TAP emissions from the horse, cargo, and utility trailer manufacturing and painting material, using the purchase records required by Permit Condition 2.7, the MSDS' required by Permit Condition 2.8, and the material usage records required by Permit Condition 2.9 to demonstrate compliance with Permit Condition 2.5. Records of this information shall remain on site for the most recent five-year period and shall be made available to DEQ representatives upon request.

[September 26, 2007]

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Location:	Caldwell, Idaho	

3. PERMIT TO CONSTRUCT GENERAL PROVISIONS

General Compliance

1. The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the Rules for the Control of Air Pollution in Idaho. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the Rules for the Control of Air Pollution in Idaho, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

[Idaho Code §39-101, et seq.]
2. The permittee shall at all times (except as provided in the Rules for the Control of Air Pollution in Idaho) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]
3. Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

Inspection and Entry

4. Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:
 - a. Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
 - b. Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d. As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

Construction and Operation Notification

5. The permittee shall furnish DEQ written notifications as follows in accordance with IDAPA 58.01.01.211:
 - a. A notification of the date of initiation of construction, within five working days after occurrence;
 - b. A notification of the date of any suspension of construction, if such suspension lasts for one year or more;

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- c. A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date;
- d. A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date; and
- e. A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211, 5/1/94]

Performance Testing

- 6. If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.

All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.

Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

Monitoring and Recordkeeping

- 7. The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

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Location: Caldwell, Idaho

Excess Emissions

8. The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

Certification

9. All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

False Statements

10. No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

Tampering

11. No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

Transferability

12. This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

Severability

13. The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.